

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

)
JANET JENKINS, for herself and as next)
friend of ISABELLA MILLER-)
JENKINS, a/k/a ISABELLA MILLER,)
)
Plaintiffs,)
)
v.) Docket No. 2:12-CV-00184-wks
)
KENNETH L. MILLER, *et al.*)
)
Defendants.)

)

MOTION TO WITHDRAW AS CO-COUNSEL FOR VICTORIA HYDEN

NOW COME Ritchie E. Berger, Esq., Sophie E. Zdatny, and the law firm of Dinse, Knapp & McAndrew, P.C. and hereby move to withdraw as co-counsel for Victoria Hyden, pursuant to Local Rule 11(d). In support of this Motion, Movants state as follows:

1. On November 14, 2012, Ritchie E. Berger, Esq., Sophie E. Zdatny, Esq., and Dinse, Knapp & McAndrew, P.C. noticed their appearance as co-counsel on behalf of Victoria Hyden in her alleged capacity as an agent of Liberty University, Inc. and its related ministry, Thomas Road Baptist Church (ECF No. 47 and 49).
2. On October 24, 2013, Liberty University, Inc. and Thomas Road Baptist Church, Inc. were dismissed from this civil action for lack of personal jurisdiction (ECF No. 115/116)
3. Ms. Hyden has been and continues to be represented by Robert B. Hemley and Norman C. Williams, of the law firm Gravel & Shea, in her individual capacity and as an alleged agent of Response Unlimited, Inc. in this civil action.

4. As Ms. Hyden continues to have legal representation, withdrawal is permitted pursuant to Local Rule 11(d).

WHEREFORE, Movants respectfully request that this Motion to withdraw be granted.

Dated at Burlington, Vermont, this 10th day of December, 2013.

DINSE, KNAPP & McANDREW, P.C.

By: /s/ Ritchie E. Berger

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CERTIFICATE OF SERVICE

I, Ritchie E. Berger, Esq., certify that on December 10, 2013, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system. The CM/ECF system will provide service of such filing via Notice of Electronic Filing (NEF) upon all counsel or parties of record.

DINSE, KNAPP & McANDREW, P.C.

By: /s/ Ritchie E. Berger
Ritchie E. Berger, Esq.

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